

JOINT DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:	5/15/17
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	6/12/17
Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	6/27/17

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	7/12/17
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	7/27/17
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	The parties propose that discovery be stayed pending a ruling on Defendants' motion to dismiss. If the motion to dismiss is denied, the parties propose bifurcating class and merits discovery, as follows: (a) class-related fact discovery completed by 6 months after a ruling on the motion to dismiss; and (b) merits-related fact discovery deferred until after a ruling on class certification. If the Court grants class certification, merits-related fact discovery completed by 6 months after class certification order.
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	Exchange of class-related expert reports 60 days post class-related fact discovery. If the Court grants class certification, exchange of merits-related expert reports 60 days post merits-related fact discovery.
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	Class-related expert depositions completed by 60 days post class-related expert reports. If the Court grants class certification, merits-related expert depositions completed by 60 days post

	merits-related expert reports.
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference)</i>	If the Court grants class certification, completion of all merits-related discovery by 10 months after class certification order.
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	30 days post completion of all discovery.
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	No.